

1 BROOKS R. BROWN (SBN 250724)
2 *bbrown@goodwinlaw.com*
3 W. KYLE TAYMAN (pro hac vice)
4 *KTayman@goodwinlaw.com*
5 **GOODWIN PROCTER LLP**
6 901 New York Avenue NW
7 Washington, DC 20001
8 Tel.: +1 202 346 4000
9 Fax.: +1 202 346 4444

6 LAURA A. STOLL (SBN 255023)
7 *lstoll@goodwinlaw.com*
8 **GOODWIN PROCTER LLP**
9 601 S. Figueroa Street, 41st Floor
10 Los Angeles, CA 90017
11 Tel.: +1 213 426 2500
12 Fax.: +1 213 623 1673

10 Attorneys for Defendant
11 QUICKEN LOANS INC.

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15 AMANDA HILL, individually and on
16 behalf of all others similarly situated,

17 Plaintiff,

18 v.

19 QUICKEN LOANS INC.,

20 Defendant.

Case No. 5:19-cv-00163-FMO-SP

**DECLARATION OF AMY
COURTNEY IN SUPPORT OF
QUICKEN LOANS INC.'S MOTION
TO DISMISS REPLY
MEMORANDUM**

Date: June 6, 2019
Time: 10:00 a.m.
Courtroom: 6D
Judge: Hon. Fernando M. Olguin
350 W. 1st Street, 6th Floor,
Los Angeles, CA 90012

Filed concurrently with:

1. Reply in Support of Quicken Loans Inc.'s Motion to Dismiss Plaintiffs' First Amended Complaint

DECLARATION OF AMY COURTNEY

I, Amy Courtney, hereby declare and state as follows:

1. I am a Principal Data Analyst at Quicken Loans Inc. (“Quicken Loans”).

2. In my role as Principal Data Analyst and my prior positions at Quicken Loans—where I have worked continuously since January 7, 2002—I have had various duties and responsibilities relating to reviewing, analyzing, collecting and identifying call records, call recordings, and other data maintained in Quicken Loans’ systems of record.

3. I make this declaration based upon my personal knowledge and experience, my review of Quicken Loans’ non-privileged business records maintained in the normal course of Quicken Loans’ business as part of its systems of record and available to me in the regular course of my duties, my review of the First Amended Complaint, and my review of Plaintiffs’ May 9, 2019 opposition (Dkt. No. 36) to Quicken Loans’ motion to dismiss. The information provided herein is true and correct to the best of my knowledge, information, and belief.

4. From my review of Plaintiff’s opposition, I understand that Plaintiffs believe that Quicken Loans may have received information concerning Ms. Hyde, including her name and purported telephone number ending in “8955,” from LMB Mortgage Services, Inc. d/b/a LowerMyBills.com (“LMB”) in or about November 2018. Plaintiffs’ belief is not correct. I am familiar with and have reviewed the records that Quicken Loans received, and maintained in the ordinary course of business from LMB. My review of those records confirms that Quicken Loans did not receive information concerning Ms. Hyde or the telephone number ending in “8955” from LMB at any time in 2018 or 2019.

5. Quicken Loans does not have an office located at 9920 Pacific Heights Blvd., Suite 350, San Diego, CA 92121, which is referenced in Exhibit C to the

1 Declaration of Jason A. Ibey (Dkt. 36-9, 36-12). Quicken Loans does not have an
2 office located in the state of California.

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4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct.

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7 Executed on May 23, 2019.

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AMY COURTNEY